

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LUCY YORK

Plaintiff(s),

-against-

THE CITY OF NEW YORK; et al.

**JOINT PROPOSED
CIVIL CASE MANAGEMENT PLAN**

22 Civ. 06432 (CBA) (VMS)

Defendant(s).

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The parties/counsel who conferred in drafting this joint proposed case management plan:

For Plaintiff(s): Elena Cohen, Gideon Oliver, Remy Green

For Defendant(s): Daniel Braun

- A. Do the parties request referral to the Court's ADR program? Yes: ☐ No: ☒
- B. Do the parties consent to proceed before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)?
Yes: ☐ If yes, fill out the AO 85 Notice, Consent and Reference of a Civil Action to a Magistrate Judge Form and file it on ECF. <https://www.uscourts.gov/forms/civ-1-forms/notice-consent-and-reference-civil-action-magistrate-judge>.
No: ☒ If no, do not indicate which party declines consent.
- C. The parties may wish to engage in settlement discussions.
If so, Plaintiff(s) will serve demand by . Defendant(s) will respond by .
- D. Defendant(s) will answer or otherwise respond to complaint by 2/6/2023 , if not yet done.

The parties will serve Rule 26(a)(1) initial disclosures by 2/22/2023 , if not yet done.

The parties will serve initial document requests and interrogatories on or before 3/24/2023 .

Any joinder and/or amendments of the pleadings must be made by 8/22/2023* .

*Defendants maintain their right to assert affirmative defenses

The parties will complete fact discovery by 8/22/2023 .

If the parties perform expert discovery, they will serve initial disclosures by 9/21/2023 ;
initial expert reports by 10/23/2023 ; and rebuttal expert reports on or before 11/22/2023 .
All discovery, including expert depositions, will be completed by 12/22/2023 , and the parties
will file a joint letter certifying the close of all discovery by this same date.

Other considerations the parties wish to bring to the Court's attention, such as the need for
electronic discovery or confidentiality order: